

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT CANTON

In re the Bankruptcy of:

ASHLEY SCHRAMM,

Debtor.

CHAPTER 7

CASE NO. 19-61858

JUDGE: RUSS KENDIG

**MOTION TO DELAY CLOSE BY
FORTY-FIVE (45) DAYS**

Debtor Ashley Schramm, through counsel, respectfully moves this Court for an Order delaying the close of this case for forty-five (45) days from the date of this filing, until February 10, 2020. In support, the Debtor states that she anticipates filing an adversary proceeding against Creditor Cassandra Schramm, who received a preferential transfer in the form of wage garnishments in the 90 days preceding the filing of this case and has failed to return those monies to the Debtor. The Trustee did not administer an estate as those assets were exempted via the “wildcard” exemption. The debt in question has now been discharged with no objection by Creditor Cassandra Schramm.

The Debtor wishes to explore the possibility of resolving the matter without need for litigation and accordingly, respectfully requests an additional forty-five (45) days before this case is closed so that those discussions can occur and, if unsuccessful, an adversary proceeding can be filed.

Respectfully submitted,

/s/ Rebecca J. Sremack
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Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2020, a copy of the foregoing ***Motion to Delay Close by Forty-Five Days*** was filed electronically via this Court's ECF system and served upon all parties indicated on the electronic filing receipt, namely:

United States Trustee (*via ECF*)
Trustee Ann Piero Silagy, Esq. (*via ECF*)

It was also served this same date by regular U.S. mail, postage prepaid, upon the following creditors:

Cassandra Schramm
148 Moore Rd.
Akron, OH 44319

IC System Collections
PO Box 64378
Saint Paul MN 55164-0378

Sprint
6480 Sprint Pkwy
Overland Park, KS 66251-6106

Dominion Energy
120 Tredegar St
Richmond VA 23219-4306

Pathology Laboratories
33 North Ave #101
Tallmadge OH 44278-1900

Sam Pankonien
c/o Iron Cty Sheriff's Office
#2 South Sixth Street
Crystal Falls MI 49920-1442

GC Services
6330 Gulton St
Houston TX 77081-1198

Capital One Bank USA NA
PO Box 30281
Salt Lake City UT 84130-0281

Atlas Acquisitions LLC
294 Union St
Hackensack NJ 07601-4303

/s/ Rebecca J. Sremack
Rebecca J. Sremack #0092313
Counsel for Debtor